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Testimony

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Inspection Activities of the  
Food Safety and Inspection Service

Statement of  
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Before the  
Subcommittee on Oversight of  
Government Management  
Committee on Governmental Affairs  
United States Senate



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Mr. Chairman and Members of the Subcommittee:

We are pleased to appear today to discuss preliminary results of the work we are doing at your request to review productivity and quality management in inspection functions of the federal government. As you requested, we began our review in the Department of Agriculture's Food Safety and Inspection Service (herein referred to as FSIS). The review is being conducted for the Subcommittee in order to assist in its oversight of management of inspection activities across the government.

Overall, over 40 federal agencies perform inspections and about 76,000 federal employees are involved in inspection-related activities. In addition, an undetermined number of others are involved in inspections in other position classifications, such as environmental protection specialists involved in environmental inspections. You suggested the Department of Agriculture as a starting point for our examinations because Agriculture, with over 10,000 inspection-related positions, is one of the agencies most heavily involved in inspection activities. FSIS had the greatest number of inspectors within Agriculture. This first phase of our work has primarily involved poultry inspections. For the purpose of our review, we considered quality management to mean assessing (1) how well FSIS inspectors are performing their work and (2) how well the facilities, products, and workforce at each plant are conforming to requirements of law and regulations.

Our review of slaughtering and processing inspection activities is in the early stages and our observations are, at this point, preliminary. We believe, however, that FSIS may need to improve its data on measures of the following:

- Plant quality: Indications are that FSIS does not have objective, systematic measures of quality on a plant-by-plant basis that would permit a quantitative assessment of quality among various plants, or an assessment of a plant's quality over time.
- Quality of inspector performance: Preliminary work has shown that FSIS does not have the objective information to assure the quality of an inspector's performance or to assess how well inspectors are following procedures.

FSIS is experimenting with various changes to its inspection procedures. We are concerned that the apparent absence of objective data on inspector performance and plant quality, which depends on facilities, products, and workforce, could impair FSIS' ability to assess the benefits of the changes.

I would now like to discuss FSIS' changing inspection policies and procedures, our preliminary observations, and why we believe objective quality data on plants and FSIS inspectors are important.

#### FSIS inspection policies and procedures

Legislation enacted in 1906 and 1907 gave the Department of Agriculture the responsibility for inspecting meat and meat products prepared for human consumption. The Poultry Products Inspection Act, which was enacted in 1957 and subsequently amended, requires inspection of each poultry carcass. These inspections are intended to ensure that the Nation's supply of

poultry is safe for human consumption. To achieve that end, FSIS inspectors visually inspect 100 percent of the birds slaughtered for consumption. Also, the inspectors inspect the slaughter and processing facilities. Agriculture is in the process, however, of exploring new ways to satisfy itself about product safety.

In 1983, FSIS asked the National Research Council, consisting of members of the National Academy of Sciences, to assess the inspection program and recommend improvements. In a 1985 report, the National Academy of Sciences recommended an optimal inspection system that would include random sampling and rapid, inexpensive screening tests to detect chemical compounds and biological agents. The Academy also recommended that new approaches not be implemented nationally until validated by objective assessment of their impact.

In June 1986, FSIS developed a future agenda in response to the National Academy of Sciences' recommendations. FSIS said it intends to evaluate procedures that have the potential to contribute to microbiological control. FSIS also said it is considering an allocation of staff resources in slaughter and processing plant inspections that would require FSIS to identify and quantify risks to the public and to establish inspection priorities and procedures based on the risks. A National Academy of Sciences follow-up report issued May 12, 1987 (Poultry Inspection, The Basis for a Risk-Assessment Approach) provided a model for a risk-assessment approach to poultry inspection.

The primary reasons for considering changes in inspection procedures are (1) FSIS' increasing concern that the current "look at every bird" approach is not adequate for detecting a broad array of potentially hazardous chemical compounds and biological agents, and (2) FSIS has a shrinking workforce that must inspect a growing number of slaughtered birds.

In addition to considering changes in slaughter inspection, FSIS is also experimenting with changes in processing inspection procedures in which the private sector becomes more involved in quality assurance and FSIS monitors the plant's quality control system.

#### Our preliminary observations

FSIS' desire to move from detection of problems to an approach aimed at preventing problems is in line with quality assurance techniques being applied in the private sector, which involve sampling at all stages of production, statistical quality control, and participation by employees. However, it is important to point out that such an approach requires adequate data on slaughter and processing quality and appropriate analysis of such data. Any conclusions drawn from the data are only as good as the correctness of the information and the availability and accessibility of the data. In these new inspection procedures, it is particularly important for FSIS to have a means to measure (1) the quality of the plants being inspected at key points during slaughtering and processing operations, and (2) the quality of the work performed by inspectors.

### Need for quality measurement data

I would like to discuss the issue of measurement in more detail. Let me tell you what we know about the collection and use of data on the plant quality levels.

- A 1981 GAO report identified weaknesses in the collection and analysis of management data. We reported that inspection program supervisors, at times, did not adequately document the results of their monthly reviews (Improving Sanitation and Federal Inspection At Slaughter Plants: How to Get Better Results For The Inspection Dollar, CED-81-118, July 30, 1981).
- The 1985 National Academy of Sciences' report said there was no comprehensive statement of criteria, no systematic accumulation of data, and no technical analysis of the hazards or benefits to human health in the traditional inspection program or as a consequence of new techniques.
- A September 1986 Agriculture Inspector General's report indicated that FSIS did not have adequate controls over data collection and analysis involving poultry residues, such as drugs and environmental contaminants.

We do not know the extent these problems still persist. Our work to date has covered only a few meat and poultry slaughter and processing plants and a limited amount of work at regional and headquarters level activities. FSIS officials told us that the agency has requirements for the collection of various data that relate to quality. However, the desired amount of documented information is not consistently collected or analyzed. FSIS uses subjective judgment as the basis for their plant level assessment of quality.

While our preliminary work has shown that FSIS does not have objective, systematic measures of quality on a plant-by-plant basis, FSIS told us that a great deal of data are collected and entered into a central computer system and reports are generated

from these data. Computerized reports that they obtain on quality at a plant appear to be more focused on how safe the slaughtered birds are for human consumption than on the quality of the facilities and workforce.

Regarding the quality of an inspector's work, preliminary indications are that the agency does not have the information needed to objectively make assessments. We met with the Administrator of FSIS, who acknowledged that his agency does not objectively track the quality of the work performed by individual inspectors. FSIS is presently using subjective ratings to evaluate inspector performance. In fact, at one plant we visited, the Inspector-in-charge told us that the most difficult phase of his job was to rate inspector performance.

Why is performance data on FSIS inspections important? .

In February 1986, the President issued Executive Order 12552, which established a Productivity Improvement Program for the federal government. The order establishes a comprehensive program for the improvement of productivity in executive departments and agencies and sets a goal of 20 percent productivity improvement in appropriate functions by 1992. The Department of Agriculture was one of 20 federal agencies included in the program. The implementing instruction for the order, Office of Management and Budget (OMB) Bulletin 86-8, required a description of how the agency will measure quality, timeliness, and efficiency and required that baseline data be established for each. As one of its productivity improvement initiatives, Agriculture submitted to

OMB recent FSIS changes in meat and poultry slaughtering activities. We noted, however, that in the submission, FSIS did not include measures of quality or plans to develop such measures. Without quality measures, you cannot determine whether productivity is being improved at the expense of quality.

As noted earlier, FSIS is experimenting with changes in its present procedures for assuring safe poultry products. It seems to us that there is a need for quantitative performance measures to judge the effectiveness of FSIS' inspection workforce and for objective, systematic measures of quality on a plant-by-plant basis in order to assess the relative benefits of changes to present inspection procedures. Regarding measures of plant quality, an FSIS official told us that FSIS is considering ways to develop an indicator of plant performance. This would permit the tracking of plant performance over time.

With regard to inspector quality, we plan to pursue the following matters during our review:

- Is the inspector's quality increasing or decreasing?
- Is management monitoring and emphasizing inspector quality?
- What factors affect inspector quality performance?
- How can inspector quality be improved?

Regarding plant quality, we plan to determine what specific reports are generated, who gets what in terms of quality analysis on individual plants, and how the reports are being used. We also plan to consider the applicability of quality assurance techniques and the impact of moving from a focus of detection to prevention

of problems.

Our work in the area of poultry inspection will also be helpful in enabling us to identify issues for further examination when we begin our reviews of meat inspection and inspection activities in other federal agencies.

This concludes my statement. We would be pleased to respond to any questions you or any other members of the Subcommittee may have.